

# **EXHIBIT C**

## **Exhibit C**

**SMITHFIELD FOODS, et al., v. UNITED STATES OF AMERICA**

**Case No. 13-C-651**

**PLAINTIFFS' TRIAL EXHIBIT LIST**

Exhibit No./Letter	Description	Offered By	Objection	Date Offered	Date Received
1	Complaint				
2	Defendant's Answers to Plaintiffs' First Request for Admissions				
3	Defendant's Answers to Plaintiffs' First Interrogatories				
4	Defendant's Answers to Plaintiffs' Second Interrogatories				
5	Defendant's Supplemental Answer to Plaintiffs' Second Interrogatories				
6	Statement of Joshua Popp				
7	Expert Report of Dr. Robert Schroeder and Dr. Richard Pehrson				
8	Supplemental Expert Report of Dr. Robert Schroeder and Dr. Richard Pehrson				
9	Dr. Robert Schroeder's file				
10	Affidavit of Dr. Robert Schroeder				
11	Photographs taken by Dr. Schroeder				
12	Dr. Richard Pehrson's file				
13	Photographs taken by Dr. Pehrson				
14	Quantum Global Report and Supporting Exhibits including CD's prepared by Harold Meyer				
15	Continental Machinery Corporation Report prepared by Jeff Schwenk				
16	Jeff Schwenk's file				

Exhibit No./Letter	Description	Offered By	Objection	Date Offered	Date Received
17	Report prepared by Steven DeCaster, Nicollet and Associates				
18	Steven DeCaster's file				
19	Rebuttal Expert Report of Daniel O'Kelly				
20	Supplemental Rebuttal Expert Report of Daniel O'Kelly				
21	Daniel O'Kelly file				
22	Expert Report of Gerald Haynes				
23	Gerald Haynes' File				
24	Invoices for Flares Purchased by Haynes for Experiments				
25	MSDS for Haynes' tested flares				
26	Cut/Specification Sheets for Haynes' tested flares				
27	Smithfield security camera video of flare				
28	Declaration of Brian Catlin				
29	Declaration of Susan Lee				
30	Declaration of Andres Fuentes				
31	Cudahy Police Report				
32	Cudahy Fire Report				
33	City of South Milwaukee Fire Department Report				
34	St. Francis Fire Department Report				
35	Wisconsin Department of Justice Fire Marshal Antonio Martinez report				
36	Aerial Photos of Damage to Building				
37	Excerpts from Deposition of Kurtis Popp				
38	Excerpts from Deposition of Matthew Carpenter				
39	Excerpts from Deposition of Brian Catlin				

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40	Excerpts from Deposition of Andres Fuentes				
41	Excerpts from Deposition of Susan Lee				
42	Marine Corps Response to FOIA Request				
43	Specification sheets for flares tested by Gerald Haynes				
44	Sprinkler head exemplars from PCI				
45	Settlement Agreement and Release				
46	Continental Machinery Corporation equipment list				
47	Continental Machinery Corporation's Index of Documents including CD's				
48	ATF Report				
49	Lost, stolen or missing munitions reports from United States Marine Corps				
50	Report prepared by Centimark-1/7/09				
51	ACE USA Property Engineering Underwriting Report dated December 7, 2007				
52	ACE USA Property Engineering Underwriting Report dated November 14, 2008				
53	Dennis Tan statement 07-05-09, 9:45 pm				
54	York Adjuster Report #1 dated August 4, 2009				
55	Thornton Tomasetti, Code Compliance Report of South Plant Buildings, 10/10/09				
56	2007/2008 Ahern Fire Protection complete sprinkler analysis report				

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57	Ahern Dry Valve Trip Test report for System #18 dated 8-29-07				
58	Cudahy Fire Department NFIRS report and narrative for incident 09-0001098				
59	Cudahy Fire Department letter re: 9/9/02 Fire Incident – W Building				
60	South Milwaukee Fire Department NFIRS and first in report for incident 09-0001554				
61	Cudahy Police Department incident 09-009286 Supplementary Report				
62	Parul Stevens exhibit 28 – schematics of building blown up (except for last page) use PCI-004				
63	Raze Orders dated 9/10/09 and 7/10/09				
64	Range Safety Review Checklist				
65	Boiler Room Water Flow + Pull Station Trip Log Record				
66	Boiler Operator's Log Book				
67	City of Cudahy Fire Code				
68	Fire Wall and Sprinkler System Performance Comparison				
69	Thornton Tomasetti Aerial Schematic				
70	Diagram of PCI Plant with Zones Identified-S-000013				
71	Process Flow Diagram of Pre Cook Sausage -S-000014				
72	Process Flow Diagram of Fresh Sliced Bacon- Lines 1-8 S000015				
73	Process Flow Diagram of Microwave Sliced Bacon Lines 1-6 - S000016				

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74	Process Flow Diagram of Boiled Hams-S000017				
75	Process Flow Diagram of Fresh Sliced Meats-S-000018				
76	Process Flow Diagram of Microwave Sliced Bacon Lines 7-10-S-000019				
77	Process Flow Diagram of Dry Sausage and Sliced Lunch Meats-S00002013				
78	Process Flow Diagram of Microwave Topping Bacon for Food Service Line 4-S000021				
79	Thompson, N.J., <i>Fire Behavior and Sprinklers</i> , NFPA, 1964.				
80	Thompson, N.J., <i>New Developments in Upright Sprinklers</i> , NFPA Quarterly, July 1952, pages 5-18				
81	NFPA 13, <i>Standard for the Installation of Sprinkler Systems</i> , 2007				
82	NFPA 13, <i>Standard for the Installation of Sprinkler Systems</i> , 2002				
83	Oberg, F.R., <i>Heavy Timber Construction</i> , American Technical Society, 1972				
84	Brannigan, F. <i>Building Construction for the Fire Service</i> , 2 <sup>nd</sup> edition, 1982, page 144				
85	Conkling, J. and Mocella, C., <i>Chemistry of Pyrotechnics basic Principles and Theory</i> , 2 <sup>nd</sup> edition, 1982, page 144				
86	Cooper, P., and Kurowski, S., <i>Introduction to the Technology of Explosives</i> , VCH Publishers, 1996				

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87	<i>DOD Ammunition and Explosives Safety Standards: Explosives Safety Construction Criteria, 6055.09-M, Volume 2, 2012</i>				
88	<i>DOD Contractor's Safety Manual for Ammunition and Explosives, DOD 4145.26M, March 13, 2008</i>				
89	<i>DOD Ammunition and Explosives Safety Standards: General Explosives Safety Information and Requirements, 6055.09-M, Volume 1, 2012</i>				
90	International Fire Code 2006				
91	International Building Code 2006				
92	NFPA 495, <i>Explosive Materials Code</i>				
93	NFPA 1123, <i>Code for Fireworks Display</i>				
94	NFPA 1124, <i>Code for the Manufacture, Transportation, Storage, and Retail Sales of Fireworks and Pyrotechnic Articles</i>				
95	ASTM E 108, <i>Standard Test Methods for Fire Tests of Roof Coverings</i>				
96	Wisconsin Building and Fire Code Comms				
97	Fundamentals of Building Construction: Materials and Methods, Edward Allen				
98	Construction Methods, Materials and Techniques, 2 <sup>nd</sup> edition by William Spence. Thomson Delmar				
99	Loft Ignition Flow Chart				
100	Packing Specification PS200-051 Issue 11-Drew Marine Signal and Safety				

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101	Para Red Rocket MK8A specifications-Drew Marine Signal and Safety				
102	Policy- ACE American Insurance Company				
103	Policy- Allianz Global Risks US Insurance Company				
104	Policy- General Security Indemnity Company of Arizona				
105	Policy- Liberty Mutual Fire Insurance Company				
106	Policy- Tokio Marine & Nichido Fire Insurance Company, LTD				
107	Policy- Certain Underwriters at Lloyd's of London				
108	ATF- Federal Explosives Law and Regulations 2007				
109	Smithfield Foods Organizational Chart				
110	Schematic for M125				
111	MSDS for M125				
112	Pyrotechnic Simulator Safety Guide				
113	Commercial Flare-Parachute Illuminating Rocket Data Sheet				
114	Commercial Flare-Red Parachute Signal Rocket Data Sheet				
115	CCO 3500.4H-SOP				
116	CCO 3500.13-Marine Corps Enhanced Mojave Viper and Mojave Viper Program				
117	CCO 3500.4F Ch. 1,5,7, App. A-SOP for Range/Training Areas and Airspace				
118	CCO3500.4F				
119	CCO3500.4H, App. A-Definitions				
120	CCO8000.4E-SOP for Class V Material (78 pages)				



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121	CCO8000.4E-SOP for Class V Material (153 pages)				
122	CCO3500.4G-SOP for Range/Training Areas and Airspace				
123	Excerpts from USMC CCO P3500.4G				
124	Excerpts from USMC CCO P3500.4F				
125	Excerpts from USMC MCO P8020.10A				
126	Excerpts from USMC MCO 4340.1A				
127	Excerpts from USMC MCO P8020.10B				
128	Department of Defense Ammunition and Explosives Hazard Classification Procedures-DLAR 8220.1				
129	Excerpts from USMC Range Safety Pocket Guide				
130	DA PAM 385-63 Range Safety Pamphlet				
131	DOD 5100.76M-Physical Security of Sensitive Conventional Arms, Ammunition, and Explosives				
132	DOD6055.09 Ch. 14-Special Storage Procedures				
133	DOD6055.09, Oct. 2004-Ammunition and Explosive Safety Standards				
134	DOD5100.76M				
135	DODIC M125-Storage Containers				
136	MCBO8023.1-Handling, Storage, Transportation, Disposition of Ammunition and Explosives				
137	MCBO8023.1				
138	MCO4340.1A-Reporting of Missing, Lost, Stolen, or Received Government Property				

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139	MCO5530.14A-Marine Corps Physical Security Program Manual				
140	MCO P4400.150E-Consumer Level Supply Policy Manual				
141	MCO P5510.18A, Ch. 1-USMC Information and Personnel Security Program Manual				
142	MCO8020.1A-Ammunition Management and Explosive Safety Policy Manual				
143	MCO P8020.10A-Ammunition and Explosives Safety Program				
144	MCO P8020.1B-Reporting and Missing, Stolen, or Recovered Government Property				
145	MVSD Form-Mojave Viper Support Detachment				
146	MVSD SOP				
147	MVSD Map				
148	MVSD Photos				
149	MVSD Form				
150	MVSD SOP-SOP for MVSD and Using Units Aboard Forward Operating Base Wilson				
151	ORM (Operational Risk Management)				
152	Pocket Guide-Range Safety Pocket Guide Vol. 10				
153	NREA Brief (Natural Resources and Environmental Affairs Division)				
154	Desert Brief (Natural Resources and Environmental Affairs Division)				

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155	RSO-Officer in Charge (OIC), Range Safety Officer (RSO) Certification Course				
156	UXO Brief-Unexploded Ordinance				
157	Pocket Guide Vol 1.7				
158	NFESC 5500.4 (Naval Facilities Engineering Service Center)				
159	SECNAVINST 5510.30, Ch. 1- Department of Navy Personnel Security Program				
160	SECMAVINST 5510.30B- Department of Navy Instruction				
161	MCO 3570.1B-Range Safety				
162	MVSD Map-Camp Wilson Laydown				
163	Department of Transportation letter regarding Classification of Explosives-4/19/06				